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UNITED STATES DISTRICT AND BANKRUPTCY COURTS

for the

DISTRICT OF DELAWARE

LILI WAN

PLAINTIFF

VS.

YOUYI DONG
DB USA LOGISTICS INC
12 MCCULLOUGH LLC

DEFENDANTS

CIVIL ACTION NO.

COMPLAINT

JURY TRIAL DEMANDED

2023 JAN 10 PM 3:21

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COMPLAINT

Lili Wan, who is Plaintiff in this case, hereby states under the penalty of perjury as follows:

1. Plaintiff Lili Wan began working for Defendants Youyi Dong and DB Logistics USA INC on March 1, 2021, and her job was to scan goods.
2. On November 29, 2021, at approximately 9:30 a.m., a truck from a transportation company was waiting to be loaded at the dock. Since the operator was not available, Plaintiff rushed to the dock to operate the Leveler.
3. Since the Leveler had broken down but had not been repaired, Plaintiff hurriedly found a bar and went to pry the leveler plate when a sudden accident occurred and Plaintiff fell on the back of her head and was taken to the hospital in an unconscious state. The plaintiff suffered from brain concussion, prolonged headache, neck pain, blurred vision, and other serious symptoms and is still under treatment.
4. Plaintiff asked Defendant Youyi Dong, the boss of the company, to provide video of the incident, but Dong refused. Plaintiff had to call the police, Officer Syed Raza repeatedly checked the

situation and confirmed that the machine did not work properly.

5. Since Defendant Youyi Dong even refused to pay Plaintiff the half month's salary before the accident, Plaintiff had to retain a lawyer to apply for Workman's Compensation. Recently, when Plaintiff consulted Mr. Lingxi Kong about how to deal with the employer's long-standing wage arrears, Plaintiff learned that she could also sue her employer and the owner (landlord) of the equipment for personal injury due to their reckless negligence.
6. In this case, the personal injury that could have been avoided became an injury that was doomed to be forthcoming due to the defendants passing the buck to each other and failing to repair it for a long time, so Plaintiff is seeking punitive damages of \$8 million against Defendants.

DATED: 01/10/2023

Lili Wan

Lili Wan

58 Marta Dr

Wilmington DE 19808